

1 Q. When you say the Deputy's office, who
2 are you referring to?

3 A. Well, there has been a few.

4 Q. Well, let me start with the title, who
5 is the Deputy?

6 A. The Deputy Superintendent who oversaw
7 medical and that wasn't their only duty but
8 medical was part of their responsibility.

9 Q. And that would be an employee of
10 Suffolk County Sheriff's Department?

11 A. Yes.

12 Q. And again you were beginning to
13 describe how you would become aware that someone
14 would become barred, you have identified the
15 Deputy Superintendent?

16 A. They would call us to come to their
17 office with the employee.

18 Q. Would you have received any prior
19 notice of that?

20 A. Usually no, but there were sometimes
21 that I was aware that it was probably going to
22 happen.

23 Q. Was there any hearing provided for CMS
24 employees who were being barred?

1 A. No.

2 Q. Were they entitled to a hearing as far
3 as you know?

4 A. I don't have any knowledge about that.

5 Q. Well, you indicated earlier they could
6 be barred for any reason at any time?

7 A. Yes.

8 Q. What was your understanding as to
9 whether or not a CMS employee would have had a
10 right to have a hearing conducted by the Suffolk
11 County Sheriff's Department regarding the
12 barring?

13 MR. SCHUMACHER: Objection.

14 A. I was never told anything like that.

15 Q. Did you ever have an experience in
16 which -- were you aware of any CMS employee who
17 was barred by the Suffolk County Sheriff's
18 Department who received a hearing regarding their
19 barring?

20 A. No.

21 Q. I'm sorry?

22 A. No.

23 Q. So it is fair to say that a decision
24 would have been made to bar and then that

1 Deputy Superintendent Masterelli asked you to
2 tell Mrs. Porter to file a report?

3 A. As in any other case of inmate abuse or
4 accusation, that she filed an incident type
5 report explaining the information that she had.

6 Q. Did you think that Mrs. Porter had
7 documented Mr. Rosario's medical file at that
8 time pertaining to her interaction with
9 Mr. Rosario?

10 A. Would I think that?

11 Q. Did you think that?

12 A. I don't think I thought about it.

13 Q. How long did this conversation last
14 with Mrs. Porter, the first conversation that you
15 had?

16 A. I don't remember the first, the second,
17 I am telling you information that I know took
18 place. I can't tell you it is the first time --
19 it is the second time. I don't know.

20 Q. After Deputy Superintendent Masterelli
21 asked you to tell Mrs. Porter to write a written
22 report, what did you do?

23 A. Told Sheila.

24 Q. How do you do that?

1 A. She was there.

2 Q. Mrs. Porter was there during your phone
3 conversation with Deputy Superintendent
4 Masterelli?

5 A. Yes.

6 Q. Did you put Mrs. Porter on the phone
7 with Deputy Superintendent Masterelli?

8 A. No.

9 Q. Was there a reason not to put her on
10 the phone?

11 A. No.

12 Q. Did Mrs. Porter indicate that she
13 didn't want to speak with the Deputy
14 Superintendent?

15 A. No.

16 Q. Did Mrs. Porter indicate any reason why
17 she didn't call Deputy Superintendent Masterelli?

18 A. No.

19 Q. Did she know Deputy Superintendent
20 Masterelli?

21 A. I am sure she knew who she was, yes.

22 Q. When you got off the phone and Mrs.
23 Porter was there, you communicated to her that
24 Deputy Superintendent Masterelli wanted a written

1 Q. Did you ask her to do that?

2 A. I don't remember.

3 Q. Might you have asked her to do that?

4 A. What to go see them herself?

5 Q. Yes.

6 A. No, but normally I would volunteer. It
7 was something that I was very comfortable with
8 and I didn't think staff was comfortable with,
9 any staff, many times they would come to me to do
10 the reporting.

11 Q. Was there ever any indication that
12 Mrs. Porter gave you that she was not comfortable
13 going to SID with a report?

14 MR. SCHUMACHER: Objection, asked and
15 answered.

16 A. Never.

17 Q. She certainly didn't indicate that she
18 was uncomfortable on this occasion?

19 A. On any occasion.

20 Q. And on this occasion as well?

21 A. No.

22 MS. CAULO: May I have this marked
23 please.

24 (Exhibit No. 1, Interdisciplinary